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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Manuel Rios,

Plaintiff,

vs.

Kilolo Kijakazi, Acting  
Commissioner of Social Security,

Defendant.

Case No. 1:23-cv-00713-SKO

STIPULATION AND UNOPPOSED  
MOTION ORDER FOR  
EXTENSION OF TIME; ORDER

(Doc. 12)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 9, 2023 to October 10, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of August 7, 2023 and August 14, 2023, Counsel  
2 currently has 7 merit briefs, and several letter briefs and reply briefs Counsel  
3 requires additional time to brief the issues thoroughly for the Court's  
4 consideration. Defendant does not oppose the requested extension. Counsel  
5 apologizes to the Defendant and Court for any inconvenience this may cause.

6  
7 Respectfully submitted,

8 Dated: August 9, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

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10 By: /s/ Jonathan Omar Pena  
11 JONATHAN OMAR PENA  
12 Attorneys for Plaintiff  
13

14 Dated: August 9, 2023

PHILLIP A. TALBERT  
United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation  
Social Security Administration

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20 By: \*/s/ Michael Marriott  
21 Michael Marriott  
22 Special Assistant United States Attorney  
23 Attorneys for Defendant  
24 (\*As authorized by email on August 9, 2023)  
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**ORDER**

Pursuant to the parties' foregoing stipulation and unopposed motion for an extension of time (Doc. 12), IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including October 10, 2023, to file Plaintiff's Motion for Summary Judgment. The deadlines in the Scheduling Order (Doc. 5) are hereby extended accordingly.

IT IS SO ORDERED.

Dated: **August 10, 2023**

*/s/ Sheila K. Oberto*  
UNITED STATES MAGISTRATE JUDGE